

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEPHANIE JONES,

Plaintiff,

v.

FOX ROTHSCHILD LLP and IAN W.
SIMINOFF,

Defendants.

Civil Action No. 1:19-cv-08624-MKV

**DEFENDANT FOX ROTHSCHILD
LLP'S MOTION TO DISMISS
PURSUANT TO FED. R. CIV. P.
12(b)(3) AND FOR PARTIAL
DISMISSAL UNDER FED. R.
CIV. P. 12(b)(6)**

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PLEASE TAKE NOTICE that Defendant Fox Rothschild LLP ("Defendant") hereby moves the Honorable Alvin K. Hellerstein, U.S.D.J., of the United States District Court for the Southern District of New York, for an Order:

1. Dismissing this action under Federal Rule of Civil Procedure 12(b)(3), for improper venue, or transferring this action to the United States District Court for the District of New Jersey; and

2. Dismissing Counts II, III, IV, VI, VII, and VIII of the Complaint (Doc. 2) with prejudice under Federal Rule of Civil Procedure 12(b)(6), for failure to state a claim upon which relief can be granted.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Defendant relies upon the following documents, submitted herewith: (1) Memorandum of Law in Support of Defendant Fox Rothschild LLP's Motion to Dismiss or Transfer Under Fed. R. Civ. P. 12(b)(3) and for Partial Dismissal Under Fed. R. Civ. P. 12(b)(6); and (2) Declaration of Kathleen McLeod Caminiti.

PLEASE TAKE FURTHER NOTICE that a proposed Order granting Defendant's motion is also submitted herewith.

PLEASE TAKE FURTHER NOTICE that oral argument is hereby requested.

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By: s/ Kathleen McLeod Caminiti

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Dated: February 15, 2020